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and

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*Attorneys for Defendants,  
 Walmart Inc. and Jetson Electric Bikes, LLC*

**IN THE UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF WYOMING**

STEPHANIE WADSWORTH	)	
Individually and as Parent and Legal Guardian	)	
of W.W., K.W., G.W., and L.W., minor children	)	
and MATTHEW WADSWORTH,	)	
	)	Case No. 2:23-cv-00118-NDF
Plaintiffs,	)	
	)	<b>DECLARATION OF</b>
v.	)	<b>EUGENE M. LAFLAMME</b>
	)	<b>IN SUPPORT OF RESPONSE</b>
WALMART INC. and	)	<b>MEMORANDUM IN</b>
JETSON ELECTRIC BIKES, LLC,	)	<b>OPPOSITION TO PLAINTIFFS’</b>
	)	<b>MOTION TO EXCLUDE</b>
Defendants.	)	<b>EXPERT TESTIMONY OF</b>
	)	<b>JOSEPH FILAS</b>

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I, Eugene M. LaFlamme, state as follows:

1. I am an attorney at McCoy Leavitt Laskey LLC located in Waukesha, Wisconsin.

2. I am one of the attorneys of record for Defendants, Jetson Electric Bikes, LLC and Walmart Inc., admitted *pro hac vice* on August 24, 2023.

3. This case involves a February 1, 2022 residential fire in Green River, Wyoming.

4. The primary liability dispute between the parties is whether the fire originated at a Jetson Plasma hoverboard by the bedroom door of G.W. and L.W.'s bedroom or a smoking shed located outside the bedroom window of G.W. and L.W.

5. Attached as Exhibit 1 is a true and correct copy of NFPA 921 (2017 ed) section 18.1.2.

6. Attached as Exhibit 2 is a true and correct copy of NFPA 921 (2021 ed) sections 1.3, 3.3.73, 6.2, 6.3.21, 18.1.2, 18.6.2.2, 21.4.8.

7. Attached as Exhibit 3 is a true and correct copy of NFPA 921 (2024 ed) sections 1.3, 6.6.1, 18.1.2, 18.6.2.2, 21.4.8.

8. Attached as Exhibit 4 is a true and correct copy Dr. Mark Svare, "Forensic Examination of Post-Fire Damaged Electrical Conductors by Using X-Ray Radiographs", 2023.

9. Attached as Exhibit 5 is a true and correct copy Dr. Mark Svare, "Forensic Examination of Post-Fire Damaged Electrical Conductors by Quantitative Measurement", 2023.

10. Attached as Exhibit 6 are the pertinent portions of expert Brian N. Strandjord's deposition taken on November 27, 2024.

I declare under penalty of perjury that the foregoing is true and correct.

Executed: December 16, 2024



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Eugene M. LaFlamme